

# EXHIBIT C

## Bonner, Kelly

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**From:** Bonner, Kelly  
**Sent:** Thursday, February 25, 2021 9:43 AM  
**To:** 'ASlater@mazieslater.com'; 'ccalderon@mazieslater.com'; 'cgeddis@mazieslater.com'  
**Cc:** Goldberg, Seth A.; Priselac, Jessica; Hill, Coleen W.  
**Subject:** FW: John C. Iozzia - 01.20.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript & Exhibits)

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Adam,

I'm Kelly Bonner and I'll be running point on any confidentiality issues going forward.

The ZHP Parties stand by their designations in connection with the deposition of John Iozzia pending the outcome of our sealing motion before the Court.

As I understand, you advised that the ZHP Parties should file the motion to seal following the parties' previous meet and confers, and we agree that it makes sense to wait until the Court issues an order and provides some clarity.

We've compiled a list of the documents in dispute, which we can send to you, and revisit once the Court rules on the sealing motion. Until then, any existing confidentiality designations should remain in place, and treated in accordance with the Protective Order.

If you think this issue would benefit from further discussion prior to the Court's entry of an Order, we'd be happy to schedule a call. Please let us know some times that work for you, and

Thanks,  
Kelly

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**From:** Adam Slater <[ASlater@mazieslater.com](mailto:ASlater@mazieslater.com)>  
**Sent:** Monday, February 22, 2021 2:05 PM  
**To:** Hill, Coleen W. <[CWHill@duanemorris.com](mailto:CWHill@duanemorris.com)>; 'KMartello@golkow.com' <[KMartello@golkow.com](mailto:KMartello@golkow.com)>  
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Colleen:

Plaintiffs have reviewed the confidentiality designations in connection with the deposition of John Iozzia. It is Plaintiffs' position that these designations are improper, as none of the documents or testimony rises to the level requiring confidentiality such as highly proprietary/trade secret information, such that ZHP would suffer significant harm if the information were to be public. In this context, as recognized in Judge Schneider's decision addressing Torrent's over-designation of documents, there is a high bar to be met and these documents and the identified testimony does not reach that level. Plaintiffs hope that Defendants will more carefully consider the use of these designations going forward.

Please confirm whether or to what extent you will de-designate the designated documents and testimony, or wish to discuss, pursuant to the Protective Order.

Thank you,

Adam Slater

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**From:** Hill, Coleen W. <[CWHill@duanemorris.com](mailto:CWHill@duanemorris.com)>

**Sent:** Friday, February 19, 2021 6:58 PM

**To:** 'KMartello@golkow.com' <[KMartello@golkow.com](mailto:KMartello@golkow.com)>

**Cc:** 'Production@golkow.com' <[Production@golkow.com](mailto:Production@golkow.com)>; 'Finals@golkow.com' <[Finals@golkow.com](mailto:Finals@golkow.com)>; Priselac, Jessica <[JPriselac@duanemorris.com](mailto:JPriselac@duanemorris.com)>; Goldberg, Seth A. <[SAGoldberg@duanemorris.com](mailto:SAGoldberg@duanemorris.com)>; Bonner, Kelly <[KABonner@duanemorris.com](mailto:KABonner@duanemorris.com)>; Adam Slater <[ASlater@mazieslater.com](mailto:ASlater@mazieslater.com)>; Cheryll Calderon <[ccalderon@mazieslater.com](mailto:ccalderon@mazieslater.com)>; Christopher Geddis <[CGeddis@mazieslater.com](mailto:CGeddis@mazieslater.com)>; 'valpec@kirtlandpackard.com' <[valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com)>

**Subject:** RE: John C. Iozzia - 01.20.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript & Exhibits)

Good evening,

Shortly you will receive, via our firm's secure file delivery system, Mr. John Iozzia's signature page and Errata sheet for his final deposition transcript. Also, pursuant to the Fact Witness Deposition Protocol (CMO No. 20, ECF No. 632) and the Confidentiality and Protective Order (ECF No. 139) ("Protective Order") entered in the above-captioned action, attached please find the confidentiality designations for the John Iozzia deposition transcript and exhibits.

Further, pursuant to Paragraph 18 of the Protective Order, the ZHP Parties hereby re-designate ZHP-9, ZHP-14, ZHP-36, and ZHP-43 as RESTRICTED CONFIDENTIAL INFORMATION. The ZHP Parties will be producing the re-designated documents in accordance with Paragraph 18 of the Protective Order.

For Golkow's purposes, we have affixed the legend "RESTRICTED CONFIDENTIAL INFORMATION" to marked ZHP-9, ZHP-14, ZHP-36, and ZHP-43 (copies sent via Biscom). We have also affixed the legend "RESTRICTED CONFIDENTIAL INFORMATION" to marked ZHP-5, ZHP-6, and ZHP-7 (copies sent via Biscom); those documents were used during the deposition in their native form and therefore did not reflect their confidentiality designation.

**Golkow**, please let us know if you need us to follow some other process for marking these exhibits with their confidentiality designation.

Thank you and have a nice weekend,  
Coleen

**Coleen W. Hill**

Associate

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**From:** Production\_glkw <[Production@golkow.com](mailto:Production@golkow.com)>

**Sent:** Tuesday, January 26, 2021 1:07 PM

**To:** Priselac, Jessica <[JPiselac@duanemorris.com](mailto:JPiselac@duanemorris.com)>; Hill, Coleen W. <[CWHill@duanemorris.com](mailto:CWHill@duanemorris.com)>; Schwartz, Barbara <[BASchwartz@duanemorris.com](mailto:BASchwartz@duanemorris.com)>; Reeder, Nathan B. <[NBReeder@duanemorris.com](mailto:NBREeder@duanemorris.com)>

**Cc:** Finals <[Finals@golkow.com](mailto:Finals@golkow.com)>

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Please find attached the FINAL e-transcript and PDF bundle transcript of John C. Iozzia .

Please use the following link for access to the exhibits: <https://golkowanywhere.sharefile.com/d-s0c81569c33514b1f8498d80a5a457a0a>

If we can be of any further assistance in this matter, please do not hesitate to contact us.

Thank you,

**Kristie Martello*****Supervisor of Case Management***

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*In light of the Coronavirus pandemic and in an effort to keep our clients and staff safe, Golkow Litigation Services is modifying our production of hard copy materials. Printed transcripts/exhibits will ONLY be produced upon request. As always, we thank you for your continued support and understanding and hope you remain safe and well.*

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